

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JAMES B. LaFRENTZ and ILA)	
LaFRENTZ,)	
)	
Plaintiffs,)	
)	Case No. 4:18-CV-04229
v.)	
)	
3M COMPANY, et al.,)	
)	
Defendants.)	

VIDEOTAPED DEPOSITION OF
JAMES LaFRENTZ - VOLUME II
Taken on Behalf of Plaintiffs
November 15, 2018

Susan L. Law, CCR, CSR

1 BY MR. SHUTTLESWORTH:

2 Q. When they did the dust count survey, do you
3 remember what type of panel you were working with when
4 they did the count?

5 DEFENSE COUNSEL: One second, please. Same
6 objections as previously stated.

7 A. Yes, sir. I was working on a strip --

8 BY MR. SHUTTLESWORTH:

9 Q. Okay.

10 A. -- at that time. A two-hole strip.

11 Q. And did you continue to work with the two-
12 hole strips after that test was conducted?

13 DEFENSE COUNSEL: Objection. Beyond the
14 scope of cross examination, leading.

15 A. Yes, I did.

16 MR. SHUTTLESWORTH: Okay. I think that's
17 all the questions I have. Thank you, Mr. LaFrentz.

18 MR. RAMIREZ: On behalf of General
19 Dynamics, there's no questions.

20 MS. YEE: On behalf of Lockheed Martin, I
21 have no further questions.

22 MR. JUNG: On behalf of 3M, we have no
23 further questions.

24 MR. RAMIREZ: So does this --

25 MR. SHUTTLESWORTH: I so move that this now

1 **A. Just leather-type gloves, work gloves.**

2 Q. Did you ever work with or around any
3 insulative blankets.

4 **A. The kind you stuff in between walls?**

5 Q. No, this is a little different. I'm just
6 trying to -- I'm just trying to short circuit stuff
7 here. It gets more confusing. But, like, on a --
8 either at -- either at the manufacturing facilities
9 you worked at or any of the times you were working
10 with metal, did you ever see any, like, heat-resistant
11 or thermal blankets? And if you don't know what I'm
12 talking about --

13 **A. I'm not sure what you're talking about.**

14 Q. Okay. Then that's enough.

15 Okay. So let's jump ahead to General
16 Dynamics. I don't have a ton of questions here, but
17 there were a few things I just wanted to clarify or --
18 and, frankly, I'm really interested in your first five
19 years there. If we need to talk about after you went
20 into security, we can, but that's the primary focus
21 for me.

22 Let's see. So if I -- if my notes are
23 correct, when you -- from '79 to '81, that's when you
24 worked as a drill press operator; is that correct?

25 **A. '79 to '82.**

1 Q. '82?

2 A. July. I think on one of those sheets shows
3 July 5th of '82 I moved to NC machine, machinist A.

4 Q. Okay. And then from '82 to '83 is that
5 when you worked as the NC machinist?

6 A. Correct. I worked there for about two
7 years and then transferred to special program
8 security. Basically going from hourly to salary.

9 Q. All right. And if I wrote this down
10 correctly, when you were working as a drill press
11 operator, Bobby Powell, was he your direct supervisor?

12 A. I'm pretty sure that is the name of the guy
13 that was our supervisor during that time.

14 Q. Okay. Do you recall the names of any other
15 coworkers when you worked as a drill press operator
16 besides Mr. Powell?

17 A. No, sir, I don't.

18 Q. When you hired on at General Dynamics, did
19 you have to go through any type of new employee
20 orientation?

21 A. Uh-huh. Yes, I did.

22 Q. Okay. How long did that last?

23 A. I think it was several days, if I remember
24 correctly.

25 Q. Did that include any type of safety

1 **A. That's true.**

2 Q. And just so I'm clear, you only did this
3 work with the panels from when you started in '79
4 until July of '82; is that correct?

5 **A. That's the only time that I ever drilled**
6 **these panels.**

7 Q. What -- I don't know if we talked about
8 this. What was the size of the drill that you used to
9 go on the panels? Or I guess the hole, for lack of a
10 better word -- for lack of a better --

11 **A. If I remember correctly, it was a half inch**
12 **drill bit. One-half inch.**

13 Q. And was that the same or did it vary?

14 **A. No, I'm -- I'm pretty sure even the large**
15 **panels, the honeycomb, and the strips all had one-half**
16 **inch holes in them. Either one-half inch or three-**
17 **eighths, but it wasn't a real big hole.**

18 Q. Sir, I'm almost done. I've just got a few
19 more general -- general questions to ask you.

20 Well, actually, let me ask you this. It's
21 my understanding that you have a document in your
22 possession that you are claiming showed -- is it,
23 like, an industrial hygiene air sampling test from
24 your work at General Dynamics? Is that true?

25 **A. That is true.**

1 Q. Okay. And it's my understanding that your
2 work area was tested sometime in approximately 1980.
3 Is that true?

4 A. Uh-huh.

5 Q. And that that record shows there was an
6 excess level of asbestos in the air. Is that what
7 you're representing?

8 A. That's what General Dynamics' reports show.

9 Q. Okay. Let me ask you this. After that was
10 tested and you were provided that document, did you do
11 anything to change your work habits or how you
12 performed your work?

13 A. No, I didn't.

14 Q. Okay. What about anybody in your employer?
15 Did anyone at the employer come in and change how the
16 drill press operators worked or how the parts fab
17 department operated?

18 A. Not that I remember.

19 Q. Did you share that record or report that to
20 your union at all?

21 A. I don't think so. I wasn't really big on
22 unions.

23 Q. Have you -- and this goes to your entire
24 work career. Okay? This is beyond just General
25 Dynamics. Have you ever worked at a location where

1 calls for expert testimony, one, and it calls for
2 speculation. Sir, you can answer.

3 **A. Yes, I do.**

4 BY MS. DENNIS:

5 Q. Okay. How many times do you believe that
6 happened during that over-three-year time period that
7 you were drilling these panels?

8 **A. That I breathed this stuff in?**

9 MR. ZIMMERMAN: Same objections.

10 BY MS. DENNIS:

11 Q. Yes.

12 **A. I would have to say every time because**
13 **every time I did it, we were drilling it dry and it**
14 **was burning smell and created the fog.**

15 Q. Now, let me ask you this. We were looking
16 at the document and we -- you read the FM^ -- FMS 3018
17 was used as an adhesive. Does FMS 3016 -- I'm sorry,
18 3018 mean anything to you at all?

19 **A. No.**

20 Q. Okay. So you don't know who supplied that
21 material?

22 **A. I have no idea.**

23 Q. Do you know any of the names of the
24 manufacturers who would have supplied the material
25 that was made -- strike that.

1 Do you know any of the brand name or
2 manufacturer names of any of the materials that were
3 used to assemble these panels, whether that be the
4 composite material that you described or the adhesive
5 material that you described?

6 **A. When I was in security, I know one time**
7 **that they used some material that we got from 3M**
8 **working on a special project. Before that, no, I do**
9 **not know of any particular.**

10 Q. So during the time you were in parts
11 fabrication from '79 to approximately '82, do you have
12 any information about who supplied the component parts
13 that made up these panels?

14 MR. ZIMMERMAN: Asked and answered twice
15 now.

16 **A. Nothing more than they stunk.**

17 BY MS. DENNIS:

18 Q. Okay. All right. Do you know -- let me
19 ask you this. Do you know whether or not there were
20 other types used other than the FMS 3018, as far as
21 the adhesives?

22 **A. The only thing I know is that was used on**
23 **the panel that was tested on the air quality.**

24 Q. Okay.

25 MS. DENNIS: Okay. I think that's all the